

Federal Defenders OF NEW YORK, INC.

Southern District
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December 2, 2019

BY ECF AND EMAIL

Honorable Deborah A. Batts
United States District Judge
United States Courthouse
500 Pearl Street, Courtroom 24B
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 12/2/19

**Re: United States v. Dejon Jackson,
11 Cr. 265 (DAB)**

Dear Judge Batts:

I write, with the consent of the Government, to request an adjournment of Mr. Jackson's violation of supervised release plea and sentencing currently scheduled for December 3, 2019. There have been no prior requests for adjournments.

On October 29, 2019, the Court ordered the Government to produce copies of Mr. Jackson's prison records and to submit a sentencing memorandum by Tuesday, November 26, 2019. In addition, the Court ordered the defense to submit a sentencing memorandum before the hearing on December 3, 2019. The Government did not file its submission until Friday, November 29, 2019. Accordingly, defense counsel has not had sufficient time to review the Government's submission and underlying prison records with Mr. Jackson to prepare a sentencing memorandum on his behalf.

I recognize the Court's rules of practice require requests for adjournments or extensions of time at least one week before the expiration of the current deadline and apologize for this last minute request. Unfortunately, given the delay in the Government's submission, our timing could not be helped.

We therefore respectfully request the Court to adjourn Mr. Jackson's violation of supervised release plea and sentencing hearing to a time convenient to the Court on Tuesday, December 10, 2019, and ask the defense be permitted to submit our sentencing memorandum the day of the hearing, after we have a chance to review the Government's submission with Mr. Jackson.

The plea and sentencing hearing scheduled for Dec. 3, 2019 at 2:30 pm is ADJOURNED and rescheduled for December 17, 2019 at 10:30 AM. The Defense shall submit its memorandum by December 10, 2019.
SO ORDERED.

Respectfully submitted,

/s/ Marne L. Lenox



Deborah A. Batts
United States District Judge